

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

PACIFIC INDEMNITY COMPANY,	:	CIVIL ACTION NO.
	:	04-11975(RWZ)
Plaintiff,	:	
	:	
v.	:	
	:	
ALFRED KEMP, Individually and d/b/a	:	
KEMP PLUMBING	:	
	:	
and	:	
	:	
MARTIN SANDBORG, Individually and d/b/a	:	
SANDBORG PLUMBING AND HEATING,	:	
	:	
Defendants.	:	
	:	
	:	

**PLAINTIFF'S LIST OF  
EXHIBITS TO WHICH  
THERE ARE NO  
OBJECTIONS**

**EXHIBIT NUMBER**

**DESCRIPTION**

2A. through 2CC. and 2FF., 2GG., and 2II.	T. J. Klem & Associates Photographs of Fire Scene
3B. through 3U.	T. J. Klem & Associates Photographs of Evidence
4A. through 4Z.	Dedham Fire Department Photographs
5A. through 5Q.	Marino Photographs of Fire in Progress
6.	Sink
7.	Garbage Disposal
8.	Cold Water Valve Assembly
9.	Cold Water Riser

- 10. Compression Fitting For Cold Water Valve Assembly
- 11. Valves, Piping, and Fittings Recovered From Beneath Sink
- 12. Drop cloth
- 13A. through 13C. Plan Views Of Basement, First and Second Floors
- 14A. and 14B. Elevation View of Kitchen Front and Rear
  
- 16A. through 16C. Photos of Plumber's Torch Produced by Al Kemp
  
- 18A. and 18B. Figures 20 and 21 to Meyers Report
- 19A. through 19E. Eagar Photos of Exemplar, Unsoldered Copper Pipes
- 20A. through 20C. Exemplars of Unsoldered Pipes
- 21A. through 21B. Eagar Photos of Pipe and Valve Assembly Exposed to Fire While Pipe Pressurized
- 22A. through 22C. Photos of Evidence at MMR
- 23. EDS Spectra of Eutectic Lead/Tin Alloy
- 24. Microscopic Cross-Section of Solder Ridge Taken at MMR
- 25. MMR EDS Spectra, File D1\55238J.spc, #008LE, File 62.jpg
- 26. MMR EDS Spectra, File D:\55238I.spc, #0008, with tabular data, File 63.jpg
- 27. MMR EDS Spectra, File #D:\55238X.spc, #0010LE, File 47.jpg
- 28. MMR EDS Spectra D:\55238W.spc, #010, with tabular data, File 45.jpg
- 29. MMR EDS Spectra D:\55238AZ.spc, #0023LE, File 10.jpg
- 30. MMR EDS Spectra D:\55238BM.spc, #0023, with tabular data, File 11.jpg
- 31. MMR EDS Spectra D:\55238BB.spc, 0023LE, File 13.jpg

- 32. MMR EDS Spectra D:\55238BC.spc, 0023, with tabular data, File 14.jpg
- 33. Kemp Deposition Exhibit 7
- 34. Kemp Deposition Exhibit 8
- 36. Kemp Deposition Exhibit 10
- 37. Kemp Deposition Exhibit 11
- 38. Figure 1 to Horn Report
- 39. Figure 3 to Horn Report
- 40. Figure 9 to Horn Report
- 41. Figure 13 to Horn Report
- 40. Figure 14 to Horn Report
- 43. Figure 10 to Horn Report
- 44. Figure 12 to Horn Report
- 45. Figure 20 to Horn Report
- 46. Figure 21 to Horn Report
- 47. Figure 22 to Horn Report
- 48. Figure 23 to Horn Report
- 49. Figure 34 to Horn Report
- 50. Figure 4 to Horn Report
- 51. Lead/Tin Phase Diagram (Figure 33 From Horn Report)
- 52A. and 52B. Figures 20 and 21 to Meyers Report
- 53. Figure 1 to Meyers Report
- 54. Pacific Indemnity Policy No. 11509588-06 (Damages)
- 55. Checks Totaling \$2,049,000 From Pacific Indemnity to Roger and Michelle Marino (Damages)

- 56. Copy of Deed to Marino Property (Damages)
- 57. Stipulated to CV of Tom Klem
- 58. Stipulated to CV of Don Galler
- 59. Stipulated to CV of Lester MacLaughlin
- 60. Stipulated to CV of Tom Eagar
- 61. Sink Cabinet/Wall Assembly

Plaintiff reserves the right to supplement this list. Plaintiff further reserves the right to use documents identified by either defendant, and to use documents not on this list for purposes of cross-examination, impeachment or rebuttal, and for other purposes that could not presently be anticipated.

Respectfully submitted,

COZEN O'CONNOR

DATE: 3/23/07

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of Plaintiffs' List Of Exhibits To Which There Are No Objections was forwarded via electronic notification of filing on the 23<sup>rd</sup> day of March, 2007, to the following:

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